

January 21, 2019

Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401
Submitted via email to AgNOI@waterboards.ca.gov

Re: Comments regarding Ag Order 4.0 and Proposed Options Tables

Dear Mr. Robertson and Water Board Staff:

I am submitting these comments on behalf of Maverick Farming Company, LLC. My company manages wine grapes in the Central Coast region. Maverick Farming Co. supports local charities and nonprofits such as The Food Bank, Make-A-Wish, Vocational Training Center, and the County Fair. I appreciate the opportunity to comment on the development of Ag Order 4.0.

Maverick Farming manages many SIP Certified vineyards which simply streamlines work for water board staff while protecting water quality.

The SIP Certified program supports the protection of water quality and is committed to continued collaboration with Regional Board (RB) staff throughout the development of Ag Order 4.0 to seek incentives, create efficiencies, and avoid duplicative efforts.

SIP Certified warrants continued Regulatory Incentives for its growers because it is a robust, science-based program that offers adaptability and verification of implemented practices that protect water quality.

Vineyards overall are a low risk to water quality due to general growing techniques and practices in vineyard cultivation. I support numeric limits being applied to receiving water, but disagree with numeric limits applied to edge of field monitoring due to a great amount of variability in field samples.

I strongly disagrees with the proposal language in its prohibition of any discharge from a storm event. This is unreasonable and unachievable. Even in the most "natural" of landscapes, there is discharge.

Vineyards are a permanent crop and should be exempted from nitrogen reporting based on exemption criteria in ESJ.

I am concerned with Ag Order prescribing requirements that are not reasonably feasible to implement given social, economic, or technical constraints. I am also concerned with policies that create a disincentive to utilize irrigation water that is high in nitrate. I am further concerned about policies that undermine conveyance of irrigation and/or storm water to collective treatment locations.

I do not support excluding certain ranches, such as those with a specific slope, from the order. Requirements must also consider the dynamic land tenure and rotation of operators and crops on the Central Coast.

Growers on the Central Coast remain committed to continuing to improve water quality. I urge the Water Board to carefully consider the concerns of growers in our region and appreciate the opportunity to comment on the development of Ag Order 4.0.

Sincerely,



Jim Stollberg

Owner